

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA  
2023 NOV 14 PM 12:21

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN C. SHORES, JR.,

Defendant.

OFFICE OF THE CLERK  
8:23CR174

SUPERSEDING INDICTMENT

18 U.S.C. § 2251(a) & (e)

18 U.S.C. § 2422(b)

18 U.S.C. §§ 2252(a)(2) & (b)(1)

The Grand Jury charges that

COUNT I

Between on or about August 4, 2023, and on or about August 10, 2023, in the District of Nebraska and elsewhere, the defendant, JOHN C. SHORES, JR., did knowingly attempt to use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the defendant knew and had reason to know that the visual depiction would be transported in interstate commerce, to wit: Individual #1.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT II

Beginning on or about August 4, 2023, and continuing until on or about August 10, 2023, in the District of Nebraska and elsewhere, JOHN C. SHORES, JR. did use a facility and means of interstate commerce to knowingly attempt to persuade, induce, and entice an individual who had not attained the age of 18 years to engage in sexual activity for which the defendant could be charged with a criminal offense, to wit: sexual assault of a child in violation of Neb. Rev. Stat. § 28-319.01 and Neb. Rev. Stat. § 28-320.01 involving Individual #1.

In violation of Title 18, United States Code, Section 2422(b).

COUNT III

Between on or about July 7, 2020, and on or about October 18, 2021, in the District of Nebraska and elsewhere, the defendant, JOHN C. SHORES, JR., did use a facility and means of interstate commerce to knowingly attempt to persuade, induce, and entice an individual who had not attained the age of 18 years to engage in prostitution and sexual activity for which the defendant could be charged with a criminal offense, to wit: sexual assault of a child in violation of Neb. Rev. Stat. § 28-319.01 and Neb. Rev. Stat. § 28-320.01 involving Individual #2.

In violation of Title 18, United States Code, Section 2422(b).

COUNT IV

Between on or about August 23, 2022, and on or about August 10, 2023, in the District of Nebraska, defendant JOHN C. SHORES, JR., did knowingly receive and distribute, and attempt to receive and distribute, using any means and facility of interstate and foreign commerce, any visual depiction, the production of such visual depiction having involved the use of a minor engaging in sexually explicit conduct and such visual depiction being of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT V

Between on or about July 17, 2022, and on or about July 18, 2022, in the District of Nebraska and elsewhere, the defendant, JOHN C. SHORES, JR., did knowingly attempt to use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the defendant knew and had reason to know that the visual depiction would be transported in interstate commerce, to wit: Individual #3.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT VI

Beginning on or about July 17, 2022, and continuing until on or about July 18, 2022, in the District of Nebraska and elsewhere, JOHN C. SHORES, JR. did use a facility and means of interstate commerce to knowingly attempt to persuade, induce, and entice an individual who had not attained the age of 18 years to engage in sexual activity for which the defendant could be charged with a criminal offense, to wit: sexual assault of a child in violation of Neb. Rev. Stat. § 28-319.01 and Neb. Rev. Stat. § 28-320.01 involving Individual #3.

In violation of Title 18, United States Code, Section 2422(b).

COUNT VII


Between on or about April 8, 2023, and on or about May 16, 2023, in the District of Nebraska and elsewhere, the defendant, JOHN C. SHORES, JR., did knowingly use, persuade, induce, entice, and coerce a minor, and attempt to use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the defendant knew and had reason to know that the visual depiction would be transported in interstate commerce, to wit: Individual #4.

In violation of Title 18, United States Code, Section 2251(a) and (e).

A TRUE BILL.

  
FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

  
Kelli L. Ceraolo, MN #0398049  
Assistant U.S. Attorney